PERSONAL DATA PROTECTION

At **JonatanMars vzajemci, družba za upravljanje, d.o.o.**, we pay particular attention to data protection and handle personal data carefully, responsibly and in accordance with applicable regulations.

We respect your right to privacy and process data in a manner that protects your interests, fundamental rights and freedoms. We process personal data lawfully, fairly and transparently, ensuring an appropriate level of security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage through appropriate technical or organisational measures. Before processing your personal data, we carefully assess the proportionality of the intended processing and any positive or negative effects it may have on you or your personal data protection rights.

Legal basis

The legal basis for the processing of personal data is provided by:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC, the General Data Protection Regulation (**GDPR**);
- the Personal Data Protection Act;
- the Investment Funds and Management Companies Act;
- the Electronic Communications Act;
- the Prevention of Money Laundering and Terrorist Financing Act;
- the Rules on the technical conditions to be met by secure remotely controlled or electronic procedures and means of identification;
- tax regulations; and
- any other regulations governing the processing and/or protection of personal data.

Personal data controller

The personal data controller is **JonatanMars vzajemci, družba za upravljanje, d.o.o.**, Dunajska cesta 165, 1000 Ljubljana.

Access to your personal data and the right to process it for specifically defined purposes are limited to authorised employees of JonatanMars vzajemci and carefully selected authorised contractual processors that can provide sufficient guarantees, including the security of processing. These processors have entered into personal data processing agreements with us and are bound by the same personal data processing standards as we are.

JonatanMars vzajemci has appointed a Data Protection Officer. The Data Protection Officer can be contacted at dpo@jonatanmars.com.

Personal data

Personal data means any information relating to an individual, such as a first name, surname, tax number, email address and any other information that can identify and relates to that individual.

You are required to provide us with true, accurate and complete personal data and to inform us of any changes.

Purposes of personal data processing

We process your personal data on the basis of our business relationship with you, such as a signed application form or agreement, on the basis of the law, on the basis of our legitimate interests and on the basis of your consent.

Processing personal data for purposes other than those for which it was originally collected is permitted only where the new purpose is compatible with the original purpose or where applicable regulations provide otherwise.

Except where required by law, we will not disclose your personal data to any third party without your written consent. As a rule, we process your personal data within the European Union and the European Economic Area (**EEA**). In certain cases, however, we may also transfer your data to recipients outside the EU and the EEA. In such cases, the same level of personal data protection will be ensured as if we carried out the processing ourselves, and all applicable requirements relating to transfers of personal data to third countries will be observed.

Processing based on a contract

We process your personal data in connection with the provision of services **()** for the purpose of fulfilling our obligations arising from our business relationship with you.

When establishing a relationship with you, such as through an application form or agreement, we request all information that we are required to obtain under applicable regulations. If you do not provide all the necessary information, we will ask you to provide it. If you still do not wish to provide it, we reserve the right not to establish the relationship with you or to terminate it.

When the relationship is established or subsequently, you may voluntarily provide other information that was not expressly required when the relationship was established. In certain cases and in accordance with applicable regulations, we may also obtain certain information from third parties or public sources.

Before establishing a relationship, we may process the information you provide to contact you in connection with advice, to determine your financial profile so that we can recommend a suitable product, or to inform you about our offering.

Processing based on law

We process personal data under various laws to fulfil our legal obligations and for purposes required by applicable regulations, including tax regulations and regulations concerning the prevention of money laundering and terrorist financing.

Processing based on legitimate interests

We may process personal data for our legitimate interests or those of third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject that require the protection of personal data, particularly where the data subject is a child.

Our legitimate interests relate to conducting our activities in a user-friendly and secure manner that complies with applicable requirements. We support processing based on legitimate interests with an impact assessment that identifies the legitimate interest and assesses whether the interests of the individuals whose data is to be processed override the company's legitimate business interest.

The company's legitimate interests include developing, advertising and offering a variety of products and services, improving business processes, ensuring legal compliance, safeguarding business operations and data processing, better adapting our offering and improving your user experience.

Processing based on consent

We may also process personal data on the basis of your freely given consent. By providing consent, you agree that personal and other data collected in the course of providing our services or through other forms of interaction, including information collected through your web browser, may be collected, stored and used for the purposes you select.

We receive data directly from you or from other sources, such as social networks, websites or other public sources, or from contractual service providers that collect personal data or conduct surveys or market research on our behalf.

If a consent form is incomplete, you authorise us to add missing information already available to us from other contract, transaction or sales documentation. As part of your consent, you may select one or more of the following purposes for processing personal data:

- direct marketing, such as information about the company's promotional activities and targeted or segmented marketing, including newsletters, articles, company magazines, event invitations, offers, promotional materials, greeting cards, newspapers and prize competitions;
- surveys or market research for our purposes;
- statistical processing; and
- profiling and monitoring customer purchasing behaviour, including past periods, on the basis of previous activities, and processing and receiving communications and benefits intended and tailored for you.

Consent is primarily intended to support the development of our products and services, adaptation of our offering, improvement of your user experience, receipt of company communications and assistance with financial decisions.

Your consent does not affect any previous approvals or consents that we may have obtained from you before it took effect, provided they are not inconsistent with it. Communications based on consent are sent through the communication channels you selected when providing consent.

Personal data retention period

The personal data retention period varies according to the type and purpose of processing. Certain data is retained for 10 years or longer after the termination of the business relationship or completion of a transaction. Data processed on the basis of voluntary consent is retained until consent is withdrawn. A longer retention period may be prescribed by law.

Personal data processed for one-off events, such as conferences, meetings, lectures, prize competitions, visits and excursions, is retained in accordance with applicable law and the rules of the individual event, or until consent is withdrawn.

If we receive a request for deletion, we will implement the request by restricting the processing of the data to the purposes prescribed by applicable regulations or internal rules.

Where personal data has been anonymised so that it can no longer be linked to a specific person, it may be retained and processed without a time limit.

Rights of the individual

We enable you to exercise your rights relating to the processing of personal data without undue delay and no later than one month after receiving your request. The period for responding may be extended by up to two additional months. If this happens, we will notify you within one month of receiving your request and explain the reasons for the delay.

You have the following rights concerning your personal data:

- the right to inspect and access your personal data;
- the right to rectify inaccurate data, while we reserve the right to request documentation demonstrating the relevant changes;
- the right to obtain a transcript and copy of the data. You are entitled to one free copy of your personal data in electronic or printed form. We may charge a reasonable fee for additional copies, taking into account the cost of producing them;
- the right to restrict processing on lawful grounds;
- the right to object to processing and to request erasure of the data;
- the right to be notified of rectification, erasure or restriction of processing;
- the right to receive a list of recipients to whom your personal data has been disclosed, including when, on what legal basis and for what purpose;
- the right to information about the purpose of processing and the types of personal data processed, together with all necessary explanations, including any available information about the source where the data was not collected from the data subject;

- the right to an explanation in the event of automated decision-making involving personal data; and
- the right to lodge a complaint with the supervisory authority if you believe that the processing infringes applicable law.

Where you have provided voluntary consent, you may withdraw or change it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal.

You can withdraw or change your consent at our registered office or by sending a notice to dpo@jonatanmars.com. For any additional information, you can contact us on the following toll-free telephone number: _____.

JonatanMars vzajemci is not liable for any disclosure of personal data or misuse of an individual's identity resulting from inadequate protection of privacy, personal data, or computer or other equipment on which personal data is stored by you or third parties.

Right to lodge a complaint

If you believe that your rights have been infringed in connection with the processing of your personal data, you may lodge a complaint by sending it to **JonatanMars vzajemci d.o.o., Dunajska cesta 165, 1000 Ljubljana**, or by email to dpo@jonatanmars.com.

You also have the right to lodge a complaint with the supervisory authority if you believe that the processing infringes applicable law. The supervisory authority is the Information Commissioner of the Republic of Slovenia: https://www.ip-rs.si.

Changes to the Privacy Policy

This Privacy Policy may be amended or supplemented at any time. You will be informed of changes on this Website. If material changes affect the processing of personal data, you will also be informed by email.

COOKIES

The Electronic Communications Act sets out the rules governing the use of cookies and similar technologies for storing information or accessing information stored on a user's computer or mobile device.

What are cookies?

A cookie is a small text file that, subject to the user's prior consent, is downloaded to the user's computer when they visit a website. It usually contains:

- the name of the server from which the cookie was sent;
- the lifetime of the cookie; and
- a value, usually a randomly generated unique number.

A cookie itself does not contain or collect information. However, when read by a server together with a web browser, it can help a website provide more user-friendly services. Only the server that sent the cookie can read and use it.

Which cookies are used on www.jonatanmars.com?

This Website uses cookies. We use cookies to personalise content and advertising, provide social-media features and analyse our traffic. We also share information about your use of our Website with our social-media, advertising and analytics partners, who may combine it with other information that you have provided to them or that they have collected through your use of their services.

Cookies are small text files used by websites to make the user experience more efficient. Under the law, we may store cookies on your device where they are strictly necessary for the operation of the Website. We require your permission for all other types of cookies.

This Website uses different types of cookies. Some cookies are placed by third-party services that appear on our pages.

You cannot change or withdraw your selection in the Cookie Declaration on our Website.

Your consent applies to the following domain: **www.jonatanmars.com**.

The Cookie Declaration was last updated on **15 July 2026** by Cookiebot.

Necessary cookies

Necessary cookies are essential for the basic functions of the Website, and the Website will not operate as intended without them. These cookies do not store personally identifiable data.

Cookie	Duration	Description
_cfuvid	Session	Cloudflare uses this cookie to track users across sessions in order to optimise the user experience by maintaining session consistency and providing personalised services.
cookieyes-consent	1 year	CookieYes sets this cookie to remember users' consent preferences so that those preferences are respected during future visits to the Website. It does not collect or store any personal data about Website visitors.
li_gc	6 months	LinkedIn sets this cookie to store the visitor's consent regarding the use of cookies for non-essential purposes.
m	1 year, 1 month and 4 days	Stripe uses this cookie to prevent fraud. The cookie identifies the device used to access the Website, allowing the Website display to be adapted appropriately.

Functional cookies

Functional cookies help provide certain features, such as sharing Website content on social-media platforms, collecting feedback and other third-party functionality.

Cookie	Duration	Description
__Secure-YNID	6 months	YouTube uses this cookie to store information about user preferences and provide a more personalised, secure and reliable experience when using YouTube and embedded videos.
__Secure-ROLLOUT_TOKEN	6 months	YouTube uses this cookie to manage the gradual rollout of new features and improvements. It allows selected users to participate in test versions of features and helps ensure platform stability during updates.
__Secure-YEC	Past	YouTube uses this cookie to store settings and data related to the user's session to improve service performance and security. It helps provide a consistent user experience across sessions.
VISITOR_PRIVACY_METADATA	6 months	YouTube uses this cookie to store the user's cookie-consent status for the current domain.
VISITOR_INFO1_LIVE	6 months	YouTube sets this cookie to measure bandwidth and determine whether the user receives the new or old player interface.
yt-remote-connected-devices	Never expires	YouTube sets this cookie to store the user's video preferences when embedded YouTube videos are used.
ytidb::LAST_RESULT_ENTRY_KEY	Never expires	YouTube uses this cookie to store the last search result selected by the user. The information is used to improve the user experience by providing more relevant search results in the future.
yt-remote-device-id	Never expires	YouTube sets this cookie to store the user's video preferences when embedded YouTube videos are used.
yt-remote-session-name	Session	YouTube uses this cookie to store the user's video-player preferences when embedded YouTube videos are used.
yt-remote-fast-check-period	Session	YouTube uses this cookie to store the user's video-player preferences for embedded YouTube videos.

Cookie	Duration	Description
yt-remote-session-app	Session	YouTube uses this cookie to store user settings and information about the interface of the embedded YouTube player.
yt-remote-cast-available	Session	This cookie stores the user's preferences regarding the availability of the casting feature in the YouTube video player.
yt-remote-cast-installed	Session	This cookie stores the user's video-player preferences when embedded YouTube videos are used.

Analytics cookies

Analytics cookies are used to understand how visitors interact with the Website. They provide information such as visitor numbers, bounce rates and traffic sources.

Cookie	Duration	Description
_ga	1 year, 1 month, 4 days and 1 minute	Google Analytics sets this cookie to calculate visitor, session and advertising-campaign data and track Website usage for analytics reporting. The cookie stores information anonymously and assigns a randomly generated number to identify unique visitors.
_ga_*	1 year, 1 month, 4 days and 1 minute	Google Analytics sets this cookie to store and count page views.
YSC	Session	YouTube sets this cookie to track views of embedded videos on YouTube pages.

Advertising cookies

Advertising cookies are used to provide visitors with personalised advertisements based on pages they have previously visited and to analyse advertising-campaign effectiveness.

Cookie	Duration	Description
_dcid	1 year, 1 month and 4 days	Collects information about user behaviour across multiple websites. This information is used to optimise the relevance of advertisements on the Website.
_gtmeec	3 months	Used by Google Tag Manager to improve event data by storing a unique identifier in a secure HTTP-only cookie. This cookie helps improve the accuracy and quality of event data, particularly when integrating with platforms such as Facebook. It also enables user tracking through the Facebook Conversion API.
_fbp	3 months	Facebook sets this cookie to display advertisements on Facebook or on a digital platform powered by Facebook advertising after a visit to the Website.
_gcl_au	3 months	Google Tag Manager sets this cookie to test the advertising effectiveness of websites that use its services.
test_cookie	16 minutes	DoubleClick.net sets this cookie to determine whether the user's browser supports cookies.
bcookie	1 year	LinkedIn sets this cookie through LinkedIn sharing buttons and advertising tags to identify browser IDs.
lidc	1 day	LinkedIn sets the lidc cookie to facilitate data-centre selection.

Cookie controller

JonatanMars vzajemci, družba za osebne finance d.o.o.
Dunajska cesta 165
1000 Ljubljana

What cookies do not do

Cookies:

- do not transfer data from your computer to any server other than the server that sent them;

- do not transfer any data to our server other than the data that the server itself sent to the user and that is returned with every visit, such as unique codes;
- do not contain your personal name, address or similar information;
- cannot infect your computer with a virus or otherwise damage it;
- do not allow the company to find out what you do on the internet or outside it, other than visiting our server; and
- do not allow us to learn your personal data unless you have already provided it to us.

If you do not want cookies to be used or do not respond to the request concerning their use, cookies will not be stored. You will nevertheless be able to continue using most of the content on our server.

This Privacy and Personal Data Protection Policy enters into force on **19 June 2026**.